

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **DAVID DILLON THOMPSON,** : **Chapter 13**
Debtor(s), : Case No. **5:22-bk-02421-MJC**

DAVID DILLON THOMPSON, :
Objector(s), : Objection to
v. : Proof of Claim

QL TITLING TRUST LTD., :
Claimant. :

OBJECTION TO PROOF OF CLAIM NO. 1 OF QL TITLING TRUST LTD.

AND COMES NOW Debtor(s) **DAVID DILLON THOMPSON**, by and through their attorneys, FISHER CHRISTMAN, with Objection to Proof of Claim No. 1 of **QL TITLING TRUST LTD.**, and in support thereof aver(s) as follows:

1. Debtor(s) **DAVID DILLON THOMPSON** (“Debtor”) filed the instant Bankruptcy Case on December 16, 2022 (“the Petition Date”).
2. **QL TITLING TRUST LTD.** (“Claimant”), filed Proof of Claim No. 1 (“the Claim”) on January 31, 2023, in the amount of \$120,457.83. A true and correct copy of Proof of Claim No. 1 is filed with this Objection and incorporated herein by reference as if set out at length.
3. Proof of Claim No. 1 appears to be an unsecured claim.
4. Proof of Claim No. 1 is or was secured by collateral, a 2019 Freightliner Cascadia.
4. Proof of Claim No. 1 is based on a writing as contemplated by Fed.R.Bank.P. 3001(c)(1), including a security agreement.
5. Proof of Claim No. 1 fails to attach any writings.
6. Proof of Claim No. 1 is not a claim based on an Open-End or Revolving Credit Agreement, and is not exempt from the requirements of Fed.R.Bank.P. 3001(c)(1).

7. Proof of Claim No. 1 is reasonably believed to include charges for interest, fees and expenses.
 8. Proof of Claim No. 1 files to itemize principal fees and expenses.
 9. Upon information and belief, Proof of Claim No. 1 fails to account for any amount received by Claimant upon liquidation of collateral.
10. The failure to include the omitted information and writings is neither substantially justified or harmless.

WHEREFORE, Debtor **DAVID DILLON THOMPSON** prays this Honorable Court for an Order that SUSTAINS this Objection to Proof of Claim No. 1 of **QL TITLING TRUST LTD.**, that Proof of Claim No. 1 be DENIED in its entirety, or, in the alternative for an appropriate sanctions, such as significant reduction of the claim, attorney's fees and/or expenses, and for such other and further relief as the Honorable Court deems just and appropriate.

/s/ John Fisher
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